

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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CHRISTOPHER CLOKE-BROWNE	:	Civil Action No. 10-CIV-2249 (LTS)
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
BANK OF TOKYO-MITSUBISHI UFJ, LTD.,	:	
mitsubishi UFJ FINANCIAL GROUP,	:	
HIDEYUKI TORIUMI, MASAHIRO HOSOMI,	:	
KYOTA OMORI, TIMOTHY S. TRACEY,	:	
RANDALL C. CHAFETZ, and ANTHONY	:	
MOON in their official and individual capacities,	:	
	:	
Defendants.	:	
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**AFFIRMATION OF DOUGLAS H. WIGDOR IN OPPOSITION OF
DEFENDANTS' MOTION TO DISMISS**

DOUGLAS H. WIGDOR, an attorney admitted to practice before the courts of this State, hereby affirms under penalty of perjury:

1. I am a member of the bar of this court and a partner in the law firm of Thompson Wigdor & Gilly LLP, counsel for Plaintiff Christopher Cloke-Browne, and as such, I am fully familiar with the matters set forth herein.

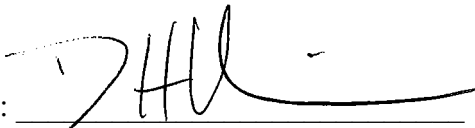
2. I submit this affirmation in opposition to Defendants' Motion to Dismiss the Amended Complaint.

3. Attached hereto as Exhibit A is a true and correct copy of the Amended Complaint filed by the Plaintiff in this case, dated March 23, 2010.

4. Upon information and belief, Plaintiff made complaints to the Compliance Department while employed by Defendants regarding Defendants' financial exposure and improprieties. Plaintiff denies any allegation to the contrary.

Dated: New York, New York
May 28, 2010

Respectfully submitted,

By: 
Douglas H. Wigdor

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Counsel for Plaintiff